

REMARKS

Summary

This Amendment is responsive to the Office Action mailed on October 3, 2003. Claims 1, 15, 18, 49, 58, 60, 84, and 89 are amended herein. Claims 27-87 have been withdrawn from consideration in response to an election requirement.

Claims 1, 88, and 89 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Evain, "*The Multimedia Home Platform*" EBU Technical Review, Spring 1998, pages 4-10 (Evain).

Claims 2-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Evain in view of Sambar, "*PowerTV Operating System*" Release 1.5, October 1998, pages 1-52 (Sambar).

Applicants respectfully traverse these rejections in view of the amended claims and the following comments.

Discussion of Amended Claims

Claims 1 and 89 are amended herein to clarify that the claimed invention provides a software interface between middleware and the core system software which enables an application program to access a function of the terminal provided by the core system software via said middleware.

Claims 15, 18, 49, 58, 60, and 84 are amended herein to correct a typographical error in the claims as filed. In particular, these claims are amended to add a period at the end of each claim.

Discussion of Evain

Evain discloses an application program interface (API) for use in connection with Multimedia Home Platform (MHP), which is a common platform for user-transparent access to multimedia services (Evain, Introduction). The API disclosed in Evain is an interface between application programs and middleware or operating systems of a multimedia terminal, which provides platform independence for application program software (Evain, page 7 "Definition of the API").

In contrast to Evain, Applicant's claimed invention is directed towards a software interface between the middleware and the core system software of the terminal which enables an application program to access a function of the terminal provided by the core system software via said middleware. The API of Evain mediates between application programs and the operating system, while the software interface of the present invention mediates between the middleware and the core system software.

Figure 1 shows an example of a television terminal which includes Applicant's claimed software interface (e.g., software interface 26). Software interface 26 shown in Applicant's Figure 1 provides an interface between the core system software 20 and the middleware 12, 14. The middleware 12, 14 mediates between the application programs 10 and the core system software 20. The software interface 26 mediates between the middleware 12, 14 and the core system software 20 to enable the application program 10 to access a function of the terminal.

The software interface of the present invention (e.g., software interface 26 shown in Applicant's Figure 1) enables different middleware and operating system software to be used with the core system software. This enables re-use of a single terminal design for multiple operating systems (see, e.g., Applicant's specification, page 2, line 32 through page 3, line 26). The API of Evain does not provide for such advantages.

Evain discusses the possibility that the API may be implemented by means of middleware (Evain, page 8 "Middleware"). However, this discussion is related to an API between an application program and the operating system of the terminal in order to achieve platform independence of the application programs (see Evain, first paragraph on page 9, left hand column). Therefore, the API of Evain is similar to the "middleware/application program interface API's" 12 of Applicant's Figure 1. As can be seen from Applicant's Figure 1, Applicants' claimed software interface (e.g., software interface 26) is a level below the API of Evain in the terminal structure.

Evain does not disclose or remotely suggest a software interface between middleware and core system software as claimed by Applicants. Evain is concerned only with an API between application programs and the operating system.

Applicants respectfully submit that the present invention is not anticipated by and would not have been obvious in view of Evain, taken alone or in combination with Sambar or any of the other prior art of record.

Further remarks regarding the asserted relationship between Applicants' claims and the prior art are not deemed necessary, in view of the amended claims and the foregoing

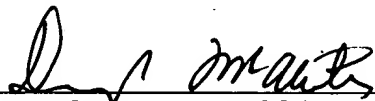
discussion. Applicants' silence as to any of the Examiner's comments is not indicative of an acquiescence to the stated grounds of rejection.

Withdrawal of the rejections under 35 U.S.C. § 102(b) and 35 U.S.C. § 103(a) is therefore respectfully requested.

Conclusion

The Examiner is respectfully requested to reconsider this application, allow each of the pending claims and to pass this application on to an early issue. If there are any remaining issues that need to be addressed in order to place this application into condition for allowance, the Examiner is requested to telephone Applicants' undersigned attorney.

Respectfully submitted,



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